

REMARKS

In the Action mailed June 14, 2005, the Examiner rejected the pending claims 1-7, 9-13, 19-27, 36-38 and 42-45 under 35 U.S.C. §§ 102(b) or 103(a). The Examiner allowed claims 14-18, 28-35 and 39-41. In reply, Applicants have amended claims 1, 19, 23, 24, 36, 37, 38, 42 and 44. Claims 1-7 and 9-45 are pending. Applicants thank the Examiner for the allowance and request reconsideration of the rejected claims in view of the amendment and the following remarks.

Claim Rejections – 35 U.S.C. § 102 and 103

The Examiner rejected claims 1-7, 9-13, 19-26, 36-38 and 42-45 under 35 U.S.C. § 102(b) as being anticipated by Raman (U.S. 5,748,186). Dependent claim 27 was rejected under 35 U.S.C. § 103(a) as being obvious in view of Raman. The rejected claims 1, 6, 12, 19, 24, 36 and 38 are independent. Applicants have amended several of the independent claims to further recite storing of the information in the destination modality. These amendments are supported by the specification, for example on page 9, lines 14-23, and also by the original dependent claims, some of which are being amended accordingly. Some of the rejected independent claims already recite a feature corresponding to the above amendments, and these independent claims are not being amended. Applicants submit that the claims as amended are patentable over the prior art of record.

Applicants' claim 1 is directed to a system for multimodal information services that retrieves information in a source modality upon a user's request and forwards it to the user in a destination modality. The information is stored in the destination modality such that it can be retrieved upon receiving a future request. One advantage of this storing is that if an identical request is later received, the needed information can be retrieved directly from the storage instead of from its original location, which would require another conversion. (*See spec. page 9, lines 18-20.*) Another advantage is that information that has been converted into a first destination modality can later be retrieved directly from the storage and used in providing the information in a second modality. (*See spec. page 9, line 21 to page 10, line 3.*) Applicants

submit that Raman does not anticipate or render obvious a system for multimodal information services wherein the information delivered to the user is stored in the destination modality.

Raman discloses a computer system that receives information contained in a document 111 and converts the information to an intermediate high-level data structure 200 that is stored in a memory 170. (*See* Raman Fig. 1.) A presentor 140 converts the intermediate high-level data structure into multimodal presentations, such as aural information 141 or visual information 142. There is no reference in Raman that the intermediate high-level data structure 200 is itself a type of multimodal presentation like the aural or visual information. In contrast, it appears that the presentor 140 in the Raman converts the intermediate high-level data structure 200 each time one of the multimodal presentations (140, 141) is made.

Raman does not disclose or suggest a system for multimodal information services wherein the information delivered to the user is stored in the destination modality such that the information can be retrieved upon receiving a future request. As such, it cannot be said that applicants' independent claim 1 is anticipated by this reference. Independent claim 1 is therefore patentable over the Raman reference.

Accordingly, applicants request that the Examiner remove his anticipation rejection of independent claim 1, as well as those of dependent claims 2-5 and 44-45 which each depend either directly or indirectly from claim 1.

With respect to the other independent claims 6, 12, 19, 24, 36 and 38, each of these claims recites a system, method or computer-readable medium wherein the information delivered to the user is stored in the destination modality. For reasons similar to those described previously in connection with claim 1, these independent claims and their dependent claims are also patentable. With regard to dependent claim 27, applicants respectfully disagree that the subject matter is obvious in view of any prior art of record and request that the Examiner provide a reference as support for the position taken. As such, Applicants request that the Examiner remove his rejections of claims 1-7, 9-13, 19-27, 36-38 and 42-45.

Conclusion

Applicants submit that the claims 1-7 and 9-45 are in condition for allowance, and request favorable consideration of the rejected claims.

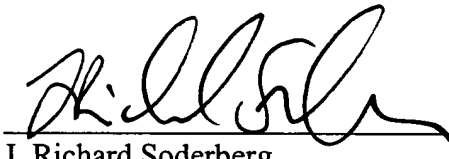
It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

This Amendment is filed within the three-month Shortened Statutory Period and no fee is therefore due. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: _____

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